

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	NO. 04-10310-WGY
)	
LORRAINE MOTT)	
_____)	

**ASSENTED TO MOTION
TO CONTINUE**

The defendant, with the assent of Assistant United States Attorney Gregory Moffatt and Assistant United States Probation Officer Denise Rivera, moves that the Rule 11 Hearing scheduled for January 12, 2005 be rescheduled to a date in March 2005.

In support of this motion, the defendant states the following:

1. The defendant is sixty-five years old and suffers from mental illness. This illness went entirely untreated until 1997. She is now on medication to control her bi-polar disorder.

2. Assistant United States Probation Officer Denise Rivera, the defendant, and undersigned counsel met on two separate occasions in order for a pre-plea report to be

completed. These sessions lasted a total of approximately six hours.

3. In addition, undersigned counsel has contacted the defendant's treating mental health personnel to prepare a report for the Court's consideration at sentencing.

4. Because of the holidays and the immense amount of material which must be verified, both the Assistant U.S. Probation Officer and the mental health expert will not be concluded with their respective reports by January 12, 2005.

5. Undersigned counsel has discussed these issues with AUSA Gregory Moffett and he assents to this motion to continue.

WHEREFORE, the defendant moves that this Court continue the Rule 11 Hearing until some time in March 2005.

Lorraine Mott
By Her Attorneys

CARNEY & BASSIL

/s/Andrew D'Angelo

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Date: November 30, 2004